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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	) No. 4:21-cr-00005-RRB-SAO
	)
Plaintiff,	) <u>COUNT 1:</u>
	) STALKING
vs.	) Vio. of 18 U.S.C. § 2261(A)(2)
	)
ROGER KEELING,	) <u>COUNT 2:</u>
	) MURDER-FOR-HIRE
Defendant.	) Vio. of 18 U.S.C. § 1958
	)
	) <u>ENHANCED STATUTORY</u>
	) <u>PENALTIES ALLEGATION:</u>
	) 18 U.S.C. § 2261(b)(6)
	)

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FIRST SUPERSEDING INDICTMENT

The Grand Jury charges that:

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COUNT 1

From about November 2020, until about January 2021, within the District of Alaska, the defendant, ROGER KEELING, with intent to harass or intimidate Victim 1, used an interactive computer service, electronic communications service, or electronic communications system to engage in a course of conduct that placed Victim 1 in reasonable fear of death or serious bodily injury or that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to Victim 1.

All in violation of 18 U.S.C. § 2261(A)(2).

COUNT 2

On or around January 2021, within the District of Alaska, the defendant, ROGER KEELING, used Zelle and the USAA Federal Savings Bank, a facility of interstate or foreign commerce, with intent that a murder be committed in violation of the laws of the State of Alaska as consideration for a promise or agreement to pay anything of pecuniary value.

All in violation of 18 U.S.C. § 1958.

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ENHANCED STATUTORY PENALTIES ALLEGATION

At the time the defendant, ROGER KEELING, committed the offense charged in Count 1, he did so in violation of a temporary or permanent civil or criminal injunction, restraining order, no-contact order, or other order described in 18 U.S.C. § 2266.

All pursuant to 18 U.S.C. § 2261(b)(6).

A TRUE BILL.

s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

s/ Kyle Reardon for  
DANIEL DOTY  
Assistant U.S. Attorney  
United States of America

s/ Bryan Schroder  
BRYAN SCHRODER  
United States Attorney  
United States of America

DATE: February 16, 2021